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MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURTNORTHERN DISTRICT OF ILLINOIS
Eastern DIVISIONEloise A. Hahn, P.E.P.E.

(Name of the plaintiff or plaintiffs)

V.

US EPA Region 5Peter Swenson, USEPATina Hyde, Acting Chiefof the DistrictAlan Nudelman, USEPA

(Name of the defendant or defendants)

Murray Jackson, USEPA

Amended COMPLAINT OF EMPLOYMENT DISCRIMINATION

CIVIL ACTION

08CV2333NO. 08CV2333

(Case number will be supplied by the assignment clerk)

Honorable Judge Coar

1. This is an action for employment discrimination.
2. The plaintiff is Eloise A. Hahn of
the county of Cook in the state of IL.
3. The defendant is US EPA Region 5, Peter Swenson, who
Tina Hyde, Alan Nudelman and Murray Jackson
resides at (street address) 2220 Jackson Blvd
(city) Chicago (county) Cook (state) IL (ZIP) 60604
(Defendant's telephone number) (312)-836-0234

4) The plaintiff sought employment or was employed by the defendant at

(street address) 27 W. Jackson Blvd

(city) Chicago (county) Cook (state) IL (ZIP code) 60604

5. The plaintiff [check one box]

(a) ☐ was denied employment by the defendant.

(b) ☒ was hired and is still employed by the defendant.

(c) ☐ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about,

(month) July, (day) 02, (year) 2008.

7. (a) The plaintiff [check one box] ☐ has not filed a charge or charges against the defendant
☒ has
 asserting the acts of discrimination indicated in this complaint with any of the following
 government agencies:

(i) ☒ the United States Equal Employment Opportunity Commission on or about
 (month) March (day) 12 (year) 2008.

(ii) ☐ the Illinois Department of Human Rights on or about
 (month) _____ (day) _____ (year) _____.

(b) If charges were filed with an agency indicated above, a copy of the charge is

attached. ☐ YES ☒ NO *will be provided within 30 days*

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

8. (a) ☒ the United States Equal Employment Opportunity Commission has not issued a
Notice of Right to Sue. but will in 30 days

- (b) ☐ the United States Equal Employment Opportunity Commission has issued a *Notice of Right to Sue*, which was received by the plaintiff on (month) _____ (day) _____ (year) _____ a copy of which *Notice* is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [check all that apply]

- (a) ☒ Age (Age Discrimination Employment Act).
 (b) ☒ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
 (c) ☒ Disability (Americans with Disabilities Act)
 (d) ☒ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
 (e) ☒ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
 (f) ☒ Religion (Title VII of the Civil Rights Act of 1964)
 (g) ☒ Sex (Title VII of the Civil Rights Act of 1964)

10. The plaintiff is suing the defendant, a state or local government agency, for discrimination on the basis of race, color, or national origin (42 U.S.C. §1983).

☒ YES ☐ NO

11. Jurisdiction over the statutory violation alleged is conferred as follows: over Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); over 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; over the A.D.E.A. by 42 U.S.C. §12117.

12. The defendant [check all that apply]

- (a) ☐ failed to hire the plaintiff.
 (b) ☒ terminated the plaintiff's employment. *proposing to terminate by 6/2/08*
 (c) ☒ failed to promote the plaintiff.
 (d) ☒ failed to reasonably accommodate the plaintiff's religion.
 (e) ☒ failed to reasonably accommodate the plaintiff's disabilities.

- (f) ☒ other (specify): Failed to grant
Plaintiff flexi-place numerous
times.
Failed to grant Plaintiff travel
privileges but only 1 every
5 years.
Failed to provide equal pay to Plaintiff

13. The facts supporting the plaintiff's claim of discrimination are as follows:

Plaintiff is not an alcoholic as
confirmed by her psychiatrist,
Dr. Greenberg. Additionally Plaintiff
was sexually harassed on March
6, 2008 by her supervisor, Peter
Swanson. Finally, Plaintiff did not
abuse the government travel card

14. [AGE DISCRIMINATION ONLY] Defendant knowingly, intentionally, and willfully discriminated against the plaintiff. yes

15. The plaintiff demands that the case be tried by a jury.

☒ YES ☐ NO

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff [check all that apply]

- (a) ☐ Direct the defendant to hire the plaintiff.
 (b) ☐ Direct the defendant to re-employ the plaintiff.
 (c) ☒ Direct the defendant to promote the plaintiff.
 (d) ☒ Find that the defendant failed to reasonably accommodate the plaintiff's religion.
 (e) ☒ Find that the defendant failed to reasonably accommodate the plaintiff's disabilities.
 (f) ☒ Direct the defendant to (specify): to quit sexually
harassing her & grant flexi-
place. Also reimburse her for her

_____ expenses in lost wages
_____ in litigating this matter
_____ } provide her equal
_____ pay. Provide reasonable
_____ accommodation for her disabilities.

(g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.

(h) ☒ Grant such other relief as the Court may find appropriate.

(Plaintiff's signature) Eloise K. Maher

(Plaintiff's name) Eloise K. Maher

(Plaintiff's street address) 1631 S. Clarence Ave

(City) Keosauqua (State) IA (ZIP) 60402

(Plaintiff's telephone number) (708) - 408 - 8266

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To: Terry (312) 466-0823

APR 24 2008

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MICHAEL W. DOBBS
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Elaine K. Hahn
Lavisa G. Hahn
Benjamin Hahn
 (Name of the plaintiff or plaintiffs)

v.

US EPA Region 5
Peter Swanson
Alan Nodolone
 (Name of the defendant or defendants)

not proper

file

432 750

CIVIL ACTION

08CV2333

JUDGE COAR

MAGISTRATE JUDGE COLE

COMPLAINT OF EMPLOYMENT DISCRIMINATION

- This is an action for employment discrimination.
- The plaintiff is a resident your name of the county of Cook in the state of IL.
- The defendant is a resident NAMES, whose street address is fill in, (city) Des Plaines (county) Cook (state) IL (ZIP) .
(Defendant's telephone number) (312)- 886-0236.
- The plaintiff sought employment or was employed by the defendant at (street address) 77 W. Jackson Blvd (city) Chicago (county) Cook (state) IL (ZIP code) 60604.
- The plaintiff [check one box]
 - ☐ was denied employment by the defendant.
 - ☒ was hired and is still employed by the defendant.
 - ☐ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) 12, (day) 01, (year) 89.

7.1 (Choose paragraph 7.1 or 7.2. No not complete both.)

(a) The defendant is not a federal governmental agency, and the plaintiff [check one box] ☐ has not ☒ has filed a charge or charges against the defendant asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

(i) ☒ the United States Equal Employment Opportunity Commission, on or about (month) 10 (day) 01 (year) 2002.

(ii) ☐ the Illinois Department of Human Rights, on or about (month) _____ (day) _____ (year) _____.

(b) If charges were filed with an agency indicated above, a copy of the charge is attached. ☐ YES. ☒ NO, but plaintiff will file a copy of the charge within 14 days.

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and (a) the plaintiff previously filed a Complaint of Employment Discrimination with the defendant asserting the acts of discrimination indicated in this court complaint.

☒ Yes (month) _____ (day) 11 (year) prior to yr 2002

☐ No, did not file Complaint of Employment Discrimination

2. The plaintiff received a Final Agency Decision on (month) _____ (day) _____ (year) _____.

c. Attached is a copy of the

a. Complaint of Employment Discrimination.

☐ YES ☒ NO, but a copy will be filed within 14 days.

(ii) Final Agency Decision

☐ YES ☒ NO, but a copy will be filed within 14 days.

8. (Complete paragraph 8 only if defendant is not a federal governmental agency.)

(a) ☒ the United States Equal Employment Opportunity Commission has not issued a Notice of Right to Sue. *this is a problem*

(b) ☐ the United States Equal Employment Opportunity Commission has issued a Notice of Right to Sue, which was received by the plaintiff on (month) _____ (day) _____ (year) _____ a copy of which Notice is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [check only those that apply]:

- (a) ☒ Age (Age Discrimination Employment Act).
- (b) ☒ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (c) ☒ Disability (Americans with Disabilities Act or Rehabilitation Act)
- (d) ☒ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) ☒ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) ☒ Religion (Title VII of the Civil Rights Act of 1964)
- (g) ☒ Sex (Title VII of the Civil Rights Act of 1964)

10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).

11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the A.D.E.A. by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791.

12. The defendant [check only those that apply]

- (a) ☐ failed to hire the plaintiff.
- (b) ☐ terminated the plaintiff's employment. *(is trying)*
- (c) ☒ failed to promote the plaintiff.

- (d) ☒ failed to reasonably accommodate the plaintiff's religion.
 (e) ☒ failed to reasonably accommodate the plaintiff's disabilities.
 (f) ☒ failed to stop harassment;
 (g) ☒ retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
 (h) ☒ other (specify):

The Defendants on a consistently
basis allege viols of employment
law. These allegations have attributed
to me taking large amounts of
lethal drugs for my sanity, well being

13. The facts supporting the plaintiff's claim of discrimination are as follows: I demand
I was falsely arrested in the 10th ward
ILJ just to force to pay 70400.
I was sexually harassed & thrown
into Mr. Swanson's backala on
about 3/6/08 for no reason.
I have continually been threatened,
arrested, & accused of matters of no meaning.
14. **[AGE DISCRIMINATION ONLY]** Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.
15. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO
16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff
 [check only those that apply]

- (a) ☐ Direct the defendant to hire the plaintiff.
 (b) ☒ Direct the defendant to re-employ the plaintiff.
 (c) ☒ Direct the defendant to promote the plaintiff.
 (d) ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.
 (e) ☒ Direct the defendant to reasonably accommodate the plaintiff's disabilities.

(f) ☒ Direct the defendant to (specify): to allow plaintiff
to be allowed flexi-place, advanced
annual & sick leave & foremost to
be treated as a professional and
not a piece of scum. Damages of
\$1,000,000 in punitive damages
for loss of health.

(g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.

(h) ☒ Grant such other relief as the Court may find appropriate.

(Plaintiff's signature)

Elaine K. Huber

(Plaintiff's name)

Elaine K. Huber

(Plaintiff's street address)

1631 S. Clarence Ave

(City) Merwyn (State) IL (ZIP) 60402

(Plaintiff's telephone number) (708) - 484-2169

Date:

4/24/08